

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

ROBYN KRAVITZ, *et al.*

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF  
COMMERCE, *et al.*

*Defendants.*

Case No.: 18-cv-1041-GJH

Hon. George J. Hazel

**SECOND JOINT MOTION TO EXTEND BRIEFING SCHEDULE ON  
PLAINTIFFS' MOTION FOR AWARD OF ATTORNEY'S FEES AND COSTS**

The parties respectfully move the Court to extend the current schedule for briefing on Plaintiffs' Motion for Award of Attorney's Fees and Costs (the "Motion")—including an imminent September 13 deadline—in order to allow the parties to continue settlement discussions regarding Plaintiffs' request for attorney's fees and costs. The parties believe that this extension is appropriate to determine whether the need for judicial resolution of the issues can be avoided. Thus, to facilitate the ongoing settlement discussions, and in the interest of judicial economy, the parties request that the Court extend the briefing schedule regarding Plaintiffs' Motion as follows:

1. On or before September 27, 2019, Plaintiffs shall file an amended or supplemental motion for attorney's fees and costs (the "Amended Motion").<sup>1</sup>

---

<sup>1</sup> Plaintiffs take the position that they are permitted to amend or supplement their motion for fees at any time. *See Scarborough v. Principi*, 541 U.S. 401 (2004). However, they agree to seek the relief requested herein to facilitate further settlement discussions.

2. Defendants' opposition to the Amended Motion shall be due 14 days after the Amended Motion is filed.
3. Plaintiffs' reply in support of the Amended Motion shall be due 14 days after Defendants' opposition is filed.

A proposed Order granting the instant motion is submitted herewith for the Court's convenience.

Dated: September 11, 2019

Respectfully Submitted,

JOSEPH H. HUNT  
Assistant Attorney General

/s/ Daniel Grant (Bar. No. 19659)

CARLOTTA P. WELLS  
Assistant Branch Director

**COVINGTON & BURLING LLP**

Shankar Duraiswamy\*

José E. Arvelo\*

Dustin Cho\*

Daniel Grant (Bar. No. 19659)

Tina M. Thomas\*

/s/ Carol Federighi  
Carol Federighi  
Senior Trial Counsel  
U.S. Department of Justice  
Civil Division  
Federal Programs Branch  
P.O. Box 883  
Washington, DC 20044  
Phone: (202) 514-1903  
Email: carol.federighi@usdoj.gov

One CityCenter  
850 Tenth Street, NW  
Washington, D.C. 20001-4956  
Tel: (202) 662-6000  
Fax: (202) 662-6302  
dgrant@cov.com  
sduraiswamy@cov.com  
jarvelo@cov.com  
dcho@cov.com  
tthomas@cov.com

*Counsel for Defendants*

P. Benjamin Duke\*  
COVINGTON & BURLING LLP  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018-1405  
Tel: (212) 8411000  
Fax: (212) 841-1010

pbduke@cov.com

Lawrence A. Hobel\*  
COVINGTON & BURLING LLP  
Salesforce Tower, 415 Mission Street  
San Francisco, CA 94105-2533  
Tel: (415) 591-6000  
Fax: (415) 591-6091  
lhobel@cov.com

*Attorneys for Kravitz Plaintiffs*

*\*Pro Hac Vice*